



Curtis, Mallet-Prevost, Colt & Mosle LLP

Almaty
Beijing
Buenos Aires
Dubai
Frankfurt
Geneva
Houston
London

Mexico City
Milan
Muscat
Nur-Sultan
Paris
Rome
Washington, D.C.

101 Park Avenue
New York, New York 10178-0061

Telephone +1 212 696 6000
Facsimile +1 212 697 1559
www.curtis.com

Eliot Lauer
Tel: +1 212 696 6192
Fax: +1 917 368 8992
E-Mail: elauer@curtis.com

June 3, 2020

The Honorable Paul A. Engelmayer
United States District Court, Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Letter Motion for Approval of Redacted Filing in FUJIFILM Mfrg. U.S.A., Inc. v. Goldman Sachs & Co. et al., Case No. 15-cv-08307-PAE (S.D.N.Y.), and Reynolds Consumer Prods. LLC and Southwire Co., LLC v. Glencore AG et al., Case No. 16-cv-05955-PAE (S.D.N.Y.)*

Dear Judge Engelmayer,

We write on behalf of Defendants Glencore International AG (“GIAG”) and Access World (Vlissingen) B.V. (“AW”) in reference to Exhibits B and H to GIAG’s and AW’s letter to the Court being filed today. Exhibit B contains documents produced by plaintiffs Reynolds Consumer Products LLC and Southwire Company, LLC, that were produced on an Attorneys’ Eyes Only basis subject to the Protective Order in that case (Reynolds/SW Dkt., ECF No. 45). Exhibit H contains documents produced by defendants Access World (USA) LLC and Access World (Vlissingen) B.V. that were produced on an Attorneys’ Eyes Only basis subject to the Protective Order in the consolidated *Aluminum* matter (Consolidated Dkt., ECF No. 381).

Accordingly, in order to prevent improper public disclosure of protected information, GIAG and AW respectfully request leave of the Court to file these exhibits under seal. Pursuant to Section (4)(B)(2) of Your Honor’s Individual Rules and Practices in Civil Cases, GIAG and AW are “(a) publicly fil[ing] the document[s] with the proposed redactions, and (b) electronically fil[ing] under seal a copy of the unredacted document with the proposed redactions highlighted” through the ECF system. We are available to discuss this request at the Court’s convenience.

6/4/2020

Granted.

SO ORDERED.

A handwritten signature in blue ink that reads "Paul A. Engelmayer".

PAUL A. ENGELMAYER
United States District Judge

Respectfully submitted,

/s/ Eliot Lauer
Eliot Lauer